

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

1. GREAT LAKES INSURANCES SE)

Plaintiff,)

vs.)

Case No: 5:22-cv-00702-JD

**2. FREDY VALLE d/b/a VALLE)
TRUCKING,)**

**3. SILVER STAR CONSTRUCTION)
COMPANY, INC.,)**

4. TYLON MACKEY,)

5. ISRAEL JUAREZ,)

6. ORD TRUCKING, INC., and)

7. ZURICH AMERICAM INS. CO.,)

Defendants.)

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8. ZURICH AMERICAN INS. CO.)

Third-Party Plaintiff)

9. BERKSHIRE HATHAWAY)

HOMESTATE INS. CO., and)

**10. PROGRESSIVE NORTHERN)
INS. CO.)**

Third-Party Defendants.)

UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER

COMES NOW Third-Party Defendant Progressive Northern Insurance Company (“Progressive”), by and through its counsel of record, Bradley E. Bowlby of the law firm of Starr, Begin & King, PLLC, Tulsa, Oklahoma, and hereby moves, unopposed, for an order extending its time to answer the Third-Party Plaintiff’s third-party complaint in this matter. In support, Progressive would state and aver as follows:

1. On February 28, 2023, Progressive's answer to Third-Party Plaintiff Zurich American Insurance Company's ("Zurich's") third-party complaint ("3P Complaint")(Dkt #28) is due.

2. Progressive has filed no previous motion for an extension of its time to respond to Zurich's 3P Complaint.

3. Progressive's deadline to answer the 3P Complaint should be extended for two reasons. First, the undersigned was assigned this matter only recently, on February 23, 2023. Progressive itself did not receive actual notice of process from the Oklahoma Ins. Dept. until nearly half of its response time had already expired. Furthermore, Zurich's 3P Complaint is lengthy, comprising 46 paragraphs and 17 pages, not including ten exhibits totaling an additional 149 pages. A short extension would enable Progressive to respond appropriately to Zurich's pleading.

4. The undersigned has been authorized by counsel for Zurich to state that Zurich has no objection to an order of this Court extending Progressive's deadline to respond to the 3P Complaint from February 28, 2023, to March 10, 2023.

5. Progressive anticipates no impact on the scheduled trial or other deadlines in this matter. A review of the docket sheet shows that this case is still in its infancy. No scheduling order has been entered and no trial date has been set.

WHEREFORE, premises considered, Third-Part Defendant Progressive Northern Insurance Company hereby moves for an order extending its time to answer the Third-Party Plaintiff's third-party complaint in this matter by ten days, from February 28, 2023, to March 10, 2023, with such other and further relief the Court deems just and equitable.

Respectfully submitted,

STARR, BEGIN, & KING, PLLC

s/Bradley E. Bowlby_____
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Attorney for Def. Progressive Northern Ins. Co.

CERTIFICATE OF SERVICE

I hereby certify that on February 27, 2023, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System for filing. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the ECF System.

s/Bradley E. Bowlby_____
